

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:24-cv-21136-JB

TUSHBABY, INC

Plaintiff,

v.

The Individuals, Partnerships and
Unincorporated Associations Identified on
Schedule A,

Defendants.

/

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT ZOOYEE

Pursuant to S.D. Fla. L.R. 11.1(d)(3), Andrew J. Palmer from Palmer Law Group ("Counsel"), hereby file this Unopposed Motion to Withdraw as Counsel for Defendant ZOOYEE (or "Defendant"), and request that this Court enter an order permitting Counsel to withdraw as counsel of record for. In support of this motion, Counsel state as follows:

1. Pursuant to S.D. Fla. L.R. 11.1(d)(3), counsel for ZOOYEE notified the Defendant of his intent to withdraw due to, among other reasons, a fundamental disagreement regarding the defense strategy. On September 18, 2024, Plaintiff filed an Amended Complaint against ZOOYEE (ECF No. 91). On September 26, 2024, counsel was instructed to pursue settlement discussions with Plaintiff. As of October 24, 2024, no settlement had been reached. Thereafter, ZOOYEE instructed counsel to cease working on the case. Counsel advised ZOOYEE of its obligation to answer in a timely manner to avoid default; however, ZOOYEE failed to respond. On December 23, 2024, Plaintiff filed a Motion for Clerk's Entry of Default against ZOOYEE (ECF No. 125), which was entered on December 26, 2024.

5. This motion is not being filed for the purpose of hindering or delaying this matter, nor will it prejudice any party.

6. Pursuant to S.D. Fla. L.R. 11.1(d)(3)(A), the current mailing address for ZOOYEE is as follows:

Attention: Ye Heying

Email: 904242171@qq.com

Room 901, Unit 1, Building 16, North Plot, Yangguang Longyuan, Shiren Area, Longnan Economic and Technological Development Zone,

Ganzhou City, Longnan City, Jiangxi Province, CN 341000

7. On March 25, 2025, in compliance with S.D. Fla. L.R. 11.1(d)(3)(A), Counsel emailed the notice of their intent to withdraw to ZOOYEE and opposing counsels.

8. On March 25, 2025, in accordance with S.D. Fla. L.R. 7.1(a)(2), Counsel also emailed all counsels of record notifying them of Counsel's intent to file a motion to withdraw.

WHEREFORE, Counsel respectfully requests that the Court grant this motion and issue an order permitting Andrew J. Palmer from Palmer Law Group to withdraw as counsel for ZOOYEE.

Dated March 27, 2025.

Respectfully submitted,

/s/Andrew J. Palmer

Andrew J. Palmer

Palmer Law Group

5353 N. Federal Highway, Suite 402

Fort Lauderdale, FL 33065

954-491-1997 (facsimile)

ajpalmer@palmerlawgroup.com

Attorney for Plaintiff